



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Medford District Office

3040 Biddle Road

Medford, Oregon 97504

email address: BLM_OR_MD_Mail@blm.gov

IN REPLY REFER TO:

1790 (ORM070)

JUN 26 2014

Dear Interested Party:

As the Grants Pass Field Manager, I have signed the Decision Record (DR) and the Finding of No Significant Impact (FONSI) for the Douglas Fire Complex Recovery Project. Forest management activities include salvage harvest of fire-injured and fire-killed trees on 1,276 acres of Bureau of Land Management (BLM) Matrix lands. These activities occur in units and along 14 miles of BLM managed road. Connected actions include construction of 4.1 miles of temporary road (to be decommissioned after use). Salvage harvest is not proposed in Riparian Reserves, 100 acre Northwest Forest Plan northern spotted owl (NSO) activity centers and 0.5 mile NSO nest cores.

The activities of the Douglas Fire Complex Recovery Project are analyzed in an Environmental Assessment (EA) (DOI-BLM-OR-M070-2014-006-EA). The EA was made available on May 7, 2014 for a 30-day public comment period. The BLM's responses to public comments are included with the DR. These comments were considered in reaching a final decision for the Rogue Cow, Burnt Rattler and Rock Star Timber Sales. The Selected Alternative is a blend of Alternative 2 and 3. The DR authorizes less ground disturbing activities than what was analyzed in the EA. This was a result of reduced road construction and less impactful harvest systems. No permanent roads will be constructed as part of this project.

This is a forest management decision. Administrative remedies are available to persons who believe they will be adversely affected by the decision. In accordance with the BLM Forest Management Regulations (43 CFR § 5003.2(a)), the decision for this project will not become effective, or be open to formal protest, until the first Notice of Sale appears in the *Grants Pass Daily Courier*, the *Medford Mail Tribune*, and the *News Review* on June 26, 2014.

43 CFR § 5003.3 subsection (b) states, "Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision." This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. Only written and signed hard copies of protests that are delivered to the Grants Pass Interagency Office will be accepted. The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error.

You can review the DR and FONSI at <http://www.blm.gov/or/districts/medford/plans/index.php>, the Medford District's internet site. Hard copies of the DR and FONSI are also available at the Grants Pass Interagency Office, 2164 NE Spalding Avenue, Grants Pass, OR 97526. Office hours are Monday through Friday, 7:30 A.M. to 4:30 P.M., closed holidays. For additional information contact Leah Schofield, Project Lead at (541)471-6504.

Sincerely,

Allen Bollschweiler
Field Manager
Grants Pass Resource Area

**FINDING OF NO SIGNIFICANT IMPACT
FOR THE
DOUGLAS FIRE COMPLEX RECOVERY PROJECT
DOI-BLM-OR-M070-2014-006-EA**

I. INTRODUCTION

The Grants Pass Resource Area, Medford District Bureau of Land Management (BLM), Douglas Fire Complex Recovery Project Environmental Assessment (EA) was made available for public comment from May 7, 2014 to June 6, 2014. The purpose and need of the project is to salvage harvest fire-killed and fire-injured trees to meet economic recovery, road safety and fire planning objectives, while simultaneously managing for other resources in the Medford District within the Douglas Fire Complex perimeter. I have decided to authorize a blend of actions analyzed in Alternative 2 and 3, hereafter known as the Selected Alternative, with associated Project Design Features (PDFs), Best Management Practices (BMPs) and seasonal restrictions. The Selected Alternative authorizes less ground disturbing activities than those analyzed in the EA. This is a result of reduced road construction and less impactful harvest systems. No permanent roads will be constructed as part of this project.

All proposed forest management activities were analyzed under the Douglas Fire Complex Recovery Project EA (DOI-BLM-OR-M070-2014-006-EA).

II. DETERMINATION OF SIGNIFICANCE

The discussion of the following significant criteria applies to the intended actions and is within the context of local importance. Chapter 3 of the EA details the effects of the Selected Alternative. None of the effects identified, including direct, indirect and cumulative effects, are considered to be significant and do not exceed those effects described in the 1995 Medford District Resource Management Plan/Final Environmental Impact Statement (1994 RMP/EIS). The environmental effects of the Selected Alternative do not meet the definition of significance in context or intensity as defined in 40 CFR § 1508.27. Therefore, an environmental impact statement is not necessary and will not be prepared.

Context. The Douglas Fire Complex burned on approximately 48,000 acres of federal and non-federally managed land. The Selective Alternative will salvage harvest approximately 1,276 acres of fire-injured and fire-killed trees. In context, this acreage represents 5% of BLM managed land within the fire perimeter. Local interests reside within Douglas, Josephine and Jackson Counties. The Selected Alternative by itself does not have international, national, region-wide, or state-wide importance.

Intensity. The following discussion is organized around the Ten Significance Criteria described in 40 CFR § 1508.27(b) as they pertain to the context of the Douglas Fire Complex Recovery Project under the Selected Alternative.

1. Impacts that may be both beneficial and adverse. The most noteworthy predicted environmental effects of the Selected Alternative include:

- a) **Soil Erosion and Sensitive Soils.** Because of the type of actions proposed and the PDFs, BMPs and seasonal restrictions that would be implemented, there would be no instances of chronic erosion or excessive soil displacement that will occur as a result of actions associated with the Selected Alternative. The magnitude and extent of soil erosion from all activities associated with the Selected Alternative will be consistent with the impact analysis and conclusions provided in the 1994 Medford RMP/EIS.
- b) **Fuel Loading and Fire hazard.** The Selected Alternative would reduce fuel loading from salvage harvest activities (EA, p. 62). Harvesting fire-killed and fire-injured trees would remove horizontal and vertical fuel loads that would reduce the potential for high intensity wildland fire behavior in the long term over the next 2 to 4 decades (EA, p. 64). The implementation of PDFs and BMPs would reduce fire hazard within salvage harvest units in the short term (EA, pp. 16-27). Fire hazard is reduced through hand piling/pile burning and lop and scatter treatments.

Reforestation is not proposed in the Douglas Fire Complex Recovery Project, although the cumulatively foreseeable action of the BLM's reforestation program is analyzed in the Selected Alternative (EA, section 3.1). Based on current trends on private industrial forest lands, approximately 24,050 acres within the Douglas Fire Complex perimeter would be stands of young conifer plantations. The BLM's 7,000 acres of potential new plantations are only 3.4% of the potential plantation acres contained within the Douglas Fire Complex Perimeter. This percentage neither beneficially nor adversely affects the overall fire hazard within the fire perimeter. Any initial, short-term increase in fire hazard would not cause significant effects that require an EIS because reforestation activities would be consistent with the impact analysis and conclusions provided in the 1994 Medford RMP/EIS.

- c) **Water Quality.** Because of the actions associated with the Selected Alternative and the implementation of PDFs, BMPs and seasonal restrictions that will be implemented, there will be no enhancement to peak flows, low flows, water yield, or temperature. No actions would occur within Riparian Reserves or within the primary shade zone of any streams or perennial waterbodies. The effects to water resources from all activities associated with the Selected Alternative would be consistent with the impact analysis and conclusions provided in the 1994 Medford RMP/EIS.
- d) **Soil Compaction and Productivity.** The analysis of skid trail compaction/displacement that was projected in GIS averaged 3.21% compaction/displacement per unit. Total compaction associated with temporary routes, tractor skid trails, landings and cable yarding corridors would account for approximately 1.3% of the project Activity Area. Each harvest unit in the Selected Alternative would be below 12% compaction and 5% productivity loss as analyzed in the 1994 Medford District RMP/EIS.
- a) **Botany.** See T&E plants in 9 below. Prior to the Douglas Complex wildfires, 312 occurrences of uncommon or rare plant species were known within the Fire Perimeter. Post-fire surveys were not conducted because of the lack of suitable habitat remaining within the project units as a consequence of fire. To address areas that were not surveyed

and that may be suitable habitat for uncommon or rare plants and fungi, PDFs were incorporated into the project to prescribe appropriate measures if Special Status plant sites are found during implementation (EA, p. 26). Past field survey data and suitable habitat potential were analyzed and the results were used to identify and defer suitable habitat that could be degraded by the Selected Alternative. The implementation of PDFs in the Selected Alternative will eliminate or minimize direct and indirect effects of the proposed action on Bureau Sensitive and Survey & Manage vascular plants, nonvascular plants, and fungi.

In the short term (approximately 1-5 years), proposed activities within the Fire Perimeter could result in spreading noxious weeds at an unknown rate that is indistinguishable from the spread caused by wildfire. Weed colonization and/or spread is anticipated because of (1) forest openings caused by mid- and high-intensity wildfire, (2) openings caused by salvage activities, including construction of landings and roads, and (3) increased vehicle traffic. By implementing the prescribed PDFs to reduce the potential spread of noxious weeds, including weed treatments and replanting disturbed sites with native plants, the Selected Alternative is expected to result in a similar level of weed infestation as the No Action Alternative, thus the effects will be neither beneficial nor adverse.

b) **Northern Spotted Owl.** See 9 below.

2. The degree to which the selected alternative will affect public health or safety. The Selected Alternative was partly developed to address the issue of public health and safety along roads due to the presence of fire-killed and fire-injured trees. As a result, the implementation of the salvage harvest along 14 miles of road is expected to reduce the risk to public health and safety. The Selected Alternative is consistent with Oregon Occupational Safety and Health Administration (OSHA) provisions, and the “2008 Field Guide for Danger Tree Identification and Response” by Oregon OSHA, US Forest Service, BLM and Associated Oregon Loggers.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers, or ecologically critical areas. It was the BLM’s recommendation to the State Historic Preservation Office (SHPO) that the Douglas Fire Complex Recovery Project will have “No Adverse Effect” to cultural resources. The SHPO concurred in a letter dated May 6, 2014 that the proposed project would have “No Adverse Effect” to cultural resources.

There are no park lands, prime farm lands, wetlands, or ecologically critical areas in the Fire Perimeter. There is one developed campground and a designated Back Country Byway that would not be affected by the Selected Alternative. The remaining area is open to dispersed recreation use, as is most of the Grants Pass Resource Area. The Selected Alternative would have a neutral effect on dispersed recreation in the Resource Area.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial. The effects of the Selected Alternative on the quality of the human environment are adequately understood by the interdisciplinary team to provide analysis for the decision. Public concerns and input have been considered throughout the analysis (see Issues section of the EA and Response to Comments of the Decision Record). For this project, the

BLM considered and reviewed numerous publications, both in support of, or in opposition to the analysis performed and conclusions reached in the EA. While there is some opposition regarding the appropriateness of salvage harvest on O&C Matrix lands, the interdisciplinary team used the best available science specific to the purpose and need of the project. Opposition to the project is not the same as “controversial effects.” The Ninth Circuit has held that a project is “highly controversial” if there is a “substantial dispute [about] the size, nature, or effect of the major Federal action rather than the existence of opposition to a use.” Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998) (quoting Sierra Club v. U.S. Forest Service, 843 F.2d 1190, 1193 (9th Cir. 1988)).

Recently, the 2014 Josephine County Election asked citizens, “Should federal agencies maximize salvage harvesting of dead and dying timber and replant areas damaged by wildfires?” Of the 27,119 people that voted, over 89% voted YES for maximum salvage on federal lands following wildfires. The BLM notes the overwhelming support from the public and organizations, but also recognizes opposition.

A complete disclosure of the predicted effects is contained in Chapter 3 of the EA. The effects of this project are similar to those of many other salvage projects implemented within the scope of the RMP and Northwest Forest Plan. Public comments did not identify inadequacies with the science that was utilized and referenced in the EA.

For this project, I find that the best available science was fully considered and interpreted appropriately to design the alternatives and predict effects based on professional judgment. The effects of the quality of the human environment are not likely to be highly controversial from a scientific or technical standpoint. These effects are documented in the EA and are typical for the actions in the Selected Alternative.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The effects of the Selected Alternative are not unique or unusual. The BLM has experience with similar forest management projects, including salvage projects, and have found the effects to be reasonably predictable. The environmental effects to the human environment are fully analyzed in Chapter 3 of the EA. Public concerns and input have been considered throughout the analysis (see Issues section of the EA and Response to Public Comments in the Decision Record). The actions analyzed in the Selected Alternative are routine in nature, which includes standard PDFs, BMPs and seasonal restrictions. These effects are well known and do not involve unique or unknown risk to the human environment.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. The Selected Alternative does not set a precedent for future actions that might have significant effects nor does it represent a decision in principle about future consideration. The Selected Alternative would meet the 1995 Medford District Resource Management Plan (RMP). Any future projects would be evaluated through the National Environmental Policy Act (NEPA) process and would stand on their own as to environmental effects.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. The interdisciplinary team evaluated the Selected Alternative in the context of past, present and reasonably foreseeable actions. Significant cumulative effects outside those already disclosed in the 1995 RMP/EIS are not predicted. A complete disclosure of the effects of the Selected Alternative is contained in Chapter 3 and Appendix C of the EA.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. The BLM recommended that the Douglas Fire Complex Recovery Project will have “No Adverse Effect” to cultural resources. SHPO concurred in a letter dated May 6, 2014 that the proposed project would have “No Adverse Effect” to cultural resources (SHPO Case No. 14-0527).

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

- a) **Fish.** There are two threatened and endangered (T&E) fish species found in the planning area: the federally threatened SONCC Coho Salmon and the federally threatened OC Coho Salmon. Coho Critical Habitat (CCH) is found adjacent to 7 units (07-6B, 11-2A, 11-3A, 13-A3, 15-4, 23-3A, & 23-4B) at an average 421 feet from CCH in Cow Creek, West Fork Cow Creek, Bear Creek, and Poorman Creek. All other units are found further away from the full riparian buffers.

Activities in the Selected Alternative will have no effect on OC and SONCC Coho Salmon and CCH (EA, p. 178). The closest CCH (Cow Creek, West Fork Cow Creek, Bear Creek, and Poorman Creek) is approximately 405 feet from the closest units (07-6B, 11-2A, 11-3A, 13-A3, 15-4, 23-3A, & 23-4B). These units will have full Riparian Reserves averaging 400 feet. Haul road segments and road related activities intersect 4 streams at 6 locations containing CCH. These 6 road segments represent 2 bridges (Bear Creek and West Fork Cow Creek), and 4 culverts (Rattlesnake Creek and Riffle Creek) on CCH streams. Sediment will not be expected to enter CCH as a result of haul or maintenance of haul roads, with dry condition haul, properly functioning cross drains, and sediment barriers installed, where needed, to prevent sediment delivery into CCH (EA, p. 178).

The Selected Alternative will follow all provisions of the Clean Water Act (40 CFR Subchapter D) and Department of Environmental Quality’s (DEQ’s) provisions for maintenance of water quality standards. The Selected Alternative will have no effect on coho salmon, CCH, or Essential Fish Habitat (EFH); therefore ESA consultation was not required.

- b) **Plants.** There are three federally listed plants on the Medford District (*Fritillaria gentneri*, *Limnanthes flocossa* ssp. *grandiflora*, and *Lomatium cookii*). Units within the Selected Alternative do not fall within the range of these T&E plant species (EA, p. 198).

Therefore surveys and formal consultation were not required. There will be no effect from the Selected Alternative on any federally listed plants.

- c) **Northern Spotted Owl.** The Douglas Fire Complex Recovery Project contains one T&E wildlife species, the federally threatened northern spotted owl (NSO). The Medford District BLM submitted a Biological Assessment to the U.S. Fish and Wildlife Service on April 28, 2014, determining the project “may affect and is likely to adversely affect” (LAA) NSO and NSO critical habitat. The USFWS issued a Biological Opinion (BO) (Tails #: 01EOW00-2014-F-0161) stating the Douglas Fire Complex Recovery Project is not likely to jeopardize the continued existence of the spotted owl and is not likely to adversely modify NSO critical habitat.

Northern Spotted Owl Critical Habitat (CHU)

Taking into account the current status of spotted owl habitat in subunit KLV-1, the adverse effects of the Douglas Fire Complex Recovery Project are not likely to appreciably diminish the conservation support function of this CHU or critical habitat at the Provincial and range-wide scales. Primarily, the project impacts are relatively very small in relation to the total amount of existing NSO habitat in CHU KLV 9.

The PDFs that will be applied during project implementation provide for aggregates of green tree, snag and down wood retention in the salvage units (EA, pp.16-27). Additionally some of the 21,000 acres of spotted owl habitat (NRF plus dispersal-only) was burned at low severity but still functions as habitat and this will not be harvested (BO, p. 53). Overall, relatively little of the CHU was compromised by the fire and therefore its current function remains. The removal of up to 454 acres (BO, p. 54) of Post Fire Foraging (PFF) habitat is not anticipated to appreciably reduce the CHU’s function because it represents only a very minor fraction (approximately 0.1%) of the 481,000 plus acres of NRF habitat in the KLV 9 CHU. Therefore, the connectivity and demographic objectives are anticipated to remain functional post implementation.

The silvicultural prescriptions will apply site-specific retention requirements to maintain a minimum of 4 snags per acre, \geq 16 inches DBH, and retain all coarse woody debris in CHU and relative high suitability (RHS) areas, high priority owl sites (EA, p. 45). The prescription targets fire-injured and fire-killed trees (EA, p. 13), which are not anticipated to contribute appreciably to the recovery support function of critical habitat. These conservative measures in the units at the stand and landscape scales in terms of retention of NSO prey habitat features along with their broad distribution across the landscape are likely to provide some benefits to NSOs.

The retention of unburned, older green, forest habitat; the retention of 77% of moderate and severely burned stands greater than 80 years old within the burn area; and its adjacency to complex early seral habitat in the area in the short-term is also present to facilitate NSO capture of prey, particularly woodrats, which will provide foraging habitat. Removal of some of the burned trees may reduce bug-disease threats posed to green trees in a post-burn environment and potentially lessen impacts to remaining NSO habitat (EA, p. 33).

Northern Spotted Owls (NSO)

The Selected Alternative will not affect NWFP areas with riparian or LSR reserve allocations. Approximately 346 acres of 100 acre NWFP NSO activity centers and 879 acres of Riparian Reserves (EA, p. 11) were moderate and severely burned habitat will not be modified by implementing the Selected Alternative. Therefore these reserve areas will continue to be managed to maintain and further restore older forest habitats to benefit a myriad of native species, including the NSO.

The Selected Alternative is on Matrix lands which are under the NWFP and where salvage harvest is allowed. Although some proportion of the NSOs in the Matrix land use allocation and on private lands within and adjacent to the action area are likely to be nesting and rearing young, the NWFP conservation strategy for the NSO does not rely on these nesting pairs and this nesting habitat to maintain the NSO population on federal lands.

The Selected Alternative is consistent with Recovery Actions (RA) 10, 12 and 32 of the NSO recovery plan. Approximately 1,500 acres of moderately and severely burned stands, greater than 80 years of age will remain untreated. Within the fire perimeter, approximately 75% burned at low severity and none of these acres will be subject to harvest (EA, p. 2). Therefore much of the NSO habitat that existed pre-fire remains, including those areas characterized as RA 32 habitat.

Approximately 25% of area (approximately 4,800 acres) within the fire perimeter burned at medium to high-severity and approximately one-quarter (1,276 acres) are planned for harvest. A relatively small portion of the area is proposed for harvest. PDFs for snags, down wood, and green tree retention important to NSOs will be provided in the short and long-term, and will be distributed broadly across the fire area as described in RA 12.

Implementation of the Selected Alternative is consistent with the intent of RA 10 in that high priority NSO sites would be conserved (i.e., not adversely impacted). The Selected Alternative avoids and minimizes to the extent practical, salvage within NSO nest patches, cores, home ranges and approximately 1,100 acres of PFF habitat within NSO core-use areas is not planned for salvage (EA, p.12). Only a very minor amount of green tree harvest will occur and most of this will take place in the outer perimeter of NSO home ranges and due to strategic road/landing construction locations. Implementing the Selected Alternative will result in a minor removal and downgrade of 34 total acres (BA, p. 32).

The BO from the FWS issued take to NSOs at 7 of 39 affected NSO home ranges. The Selected Alternative is likely to impair but not preclude the capability of the action area to fulfill its conservation role, which is to contribute demographic and dispersal support to the NSO population within the Oregon Klamath Province, which is also designated as a recovery unit, for the following reasons: This impact will not impair or preclude the demographic support function assigned to the province because (1) the rate of habitat loss at the province scale is below the 2.5% per decade anticipated by the NWFP; and (2) the additional impacts to the provincial baseline due to the Selected Alternative (the loss of

1,276 acres of mostly PFF habitat) will not significantly change the habitat baseline condition of the province with approximately 884,000 acres of NRF habitat remaining. As described above, green tree harvest is a minor component of the Selected Alternative.

The amount of incidental take associated with 1,612 acres that were consulted on is likely to be less, with the implementation of the Selected Alternative of 1,276 acres. Additionally, annual NSO surveys continue in the Klamath Density Study Area at the sites affected by the Project. Survey findings will be used to inform and refine project placement during implementation so as to avoid and minimize project impacts to NSOs. For the above reasons, the capability of the habitat and of the current population of NSOs in the Oregon Klamath Mountains province to support a persistent NSO population are likely to be retained with implementation of the Selected Alternative.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. The Selected Alternative does not violate any known federal, state, or local law or requirement imposed for the protection of the environment. Furthermore, the Selected Alternative is consistent with applicable land management plans, policies, and programs (EA, pp. 7-8).

III. FINDING

I have determined that the Selected Alternative does not constitute a major federal action having a significant effect on the human environment; an environmental impact statement is not necessary and will not be prepared. This conclusion is based on my consideration of the Council on Environmental Quality's criteria for significance (40 CFR §1508.27), with regard to the context and the intensity of the impacts described in the EA, and on my understanding of the project, review of the project analysis, and review of public comments. As previously noted, the analysis of effects has been completed within the context of the Medford District's Resource Management Plan and the Northwest Forest Plan. This conclusion is consistent with those plans and the anticipated effects are within the scope, type, and magnitude of effects anticipated and analyzed in those plans. The analysis of project effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different types of impacts and the effects were determined to be insignificant.



Allen Bollschweiller
Field Manager
Grants Pass Resource Area
Medford District, Bureau of Land Management



Date

**DECISION RECORD FOR THE
DOUGLAS FIRE COMPLEX RECOVERY PROJECT
ENVIRONMENTAL ASSESSMENT
DOI-BLM-OR-M070-2014-006-EA**

**United States Department of the Interior
Bureau of Land Management
Medford District, Grants Pass Resource Area**

I. INTRODUCTION

This Decision Record (DR) addresses forest management activities analyzed in the Douglas Fire Complex Recovery Project Environmental Assessment (EA), DOI-BLM-OR-M070-2014-006-EA. Activities analyzed in this EA are within the Matrix Land Use Allocation, under the Medford District's 1995 Resource Management Plan (RMP).

This DR applies to the salvage harvest of fire-injured and fire-killed trees for economic recovery, road safety and fire planning objectives, based on a blend of actions analyzed in Alternative 2 and 3, hereafter known as the Selected Alternative. Forest management activities covered in this DR include:

- Salvage harvest of 1,276 acres within the Matrix Land Use Allocation
- Application of 152 acres of ground based, 816 acres of cable, and 308 acres of helicopter logging
- Construction of 4.1 miles of temporary route
- Road maintenance on 102 miles of haul road
- *(No permanent road construction)*

Project Design Features (PDFs), Best Management Practices (BMPs) and seasonal restrictions will be implemented with this decision, and are disclosed in the EA, p. 16-27.

The project area is located within Josephine and Douglas Counties of Oregon. Units covered by this DR are within the Grave Creek, Middle Cow Creek, and West Fork Cow Creek Hydrologic Unit Code (HUC) 10 watersheds. These watersheds drain into either the Umpqua or Rogue Rivers. BLM lands are intermixed with private and county lands, creating a mosaic of ownership patterns.

There is a possibility of a subsequent decision in a portion of the remaining 393 acres covered by the EA. That decision may address road safety and fire planning objectives which would most likely be accomplished through stewardship projects. These acres were not included in this DR because they would not provide for an economically viable timber sale.

Appendix B and C provides a detailed description of the units and maps included in this DR.

II. PUBLIC INVOLVEMENT

The BLM initiated external scoping for this project on November 22, 2013. A scoping letter and a map describing potential project activities was sent to approximately 259 recipients, including federal, state, county and municipal government agencies, tribal governments, adjacent landowners, and interested parties on the Medford District, Grants Pass Resource Area (GPRA) and Roseburg District. The scoping letter along with a map of areas being considered was also posted on the Medford District's BLM website at <http://www.blm.gov/or/districts/medford/plans/index.php>. Notice of scoping was available in the Medford BLM's *Medford Messenger* on January 24, 2014. A total of 35 comment letters were received during the scoping period and considered in this decision. A detailed summary of the comments are included in the project record.

On January 10, 2014 a press release was issued to inform the public of a series of public meetings specific to Southwest Oregon post fire related projects. On January 15, 2014, the GPRA sent post cards to approximately 259 recipients, including federal, state, county and municipal government agencies, tribal governments, adjacent landowners, and interested parties on the GPRA and Roseburg District mailing lists informing them of the meetings. Notice of the public meetings was also published on the Medford District's BLM website.

On the evening of January 21, 2014, a public meeting was held at the Glendale High School gymnasium. A total of 22 individuals at this meeting expressed interest in the Douglas Fire Complex Recovery project. On the evening of January 23, 2014, a public meeting was held at the GPRA Interagency office. A total of 45 individuals at this meeting expressed interest in the Douglas Fire Complex Recovery project.

On January 30, 2014 a workshop was held for actively interested public, industry and environmental groups that generated focused discussion on the proposed activities. A total of 26 individuals attended this workshop.

On March 27, 2014, a pamphlet was posted on the BLM's post-fire recovery website. This document included a status update on all the post fire projects in Southwest Oregon, including the Douglas Fire Complex Recovery Project. Comments that were received by the BLM from the all of the public outreach efforts were incorporated and considered in the development of the project.

On May 7, 2014, the EA was released for a 30-day public comment period. Notice of the comment period was sent to approximately 301 individuals and/or organizations interested in the project, including federal, state, county and municipal government agencies, federally recognized Tribes, adjacent landowners, and interested parties on the GPRA and Roseburg District. The EA comment period ended on June 7, 2014. Six comment letters were received and considered during the decision making process.

An EA public meeting was held on May 15, 2014, at the Grants Pass Interagency Office from 5:45pm to 8:00pm. The purpose of the meeting was to provide an opportunity for the public to receive and discuss information concerning the project. Notice of the public meeting was sent to approximately 288 individuals and/or organizations interested in the project, including federal, state, county and municipal government agencies, federally recognized Tribes, adjacent

landowners, and interested parties on the GPRA and Roseburg Districts. Two members of the public attended the meeting. No comments were submitted from the public at this meeting.

An EA field trip was conducted on May 31, 2014. The purpose of this field trip was to provide an on the ground review for the public to address comments or concerns regarding the Douglas Fire Complex Recovery Project EA. Notice of the public meeting with requesting RSVP was sent to approximately 270 individuals and/or organizations interested in the project, including federal, state, county and municipal government agencies, federally recognized Tribes, adjacent landowners, and interested parties on the GPRA and Roseburg Districts. Five members of the public were interested and attended the field trip. No comments were submitted from the public at this field trip.

Attached to Appendix A of this DR are substantive comments received by the BLM during the 30-day EA public comment period. BLM considered and responded to these comments during project development and in developing the decision for the project.

Cooperation

The BLM is the lead agency on the Douglas Fire Complex Recovery Project EA. Cooperating parties who participated during the Interdisciplinary Team (IDT) process are as follows:

Cooperator	Representative
Douglas County	Ron Yockim
Cow Creek Band of Umpqua Indians	Tim Vredenberg

III. PLAN CONFORMANCE, CONSULTATION, COORDINATION & COOPERATION

Land Use Plan Conformance

The area in this decision falls within the Matrix Land Use Allocations (LUA) as defined in the Northwest Forest Plan/Medford District Resource Management Plan, Record of Decision 1995. Management in this LUA specifically directs:

- Mortality of entire stands or of scattered trees that results from disturbance would be harvested in salvage operations (RMP, p. 186).
- Harvest only mortality above the level needed to meet snag retention and other habitat goals and provide desired levels of coarse woody debris (RMP, p.186).
- Manage timber stands to reduce the risk of stand loss from fires, animals, insects and diseases (RMP, p. 72).
- Provide for salvage harvest of timber killed or damaged by events such as wildfire, windstorms, insects or disease, consistent with management objectives for other resources (RMP, p. 72).
- Salvage of volume from these stands following partial or complete stand mortality would be permitted provided residual structural objectives were met (RMP, p. 193).

Endangered Species Act, Section 7 Consultation

Northern Spotted Owl

Medford BLM submitted a Biological Assessment (April 28, 2014 BA) to the U.S. Fish and Wildlife Service (USFWS) stating the proposed action “may affect and is likely to adversely affect northern spotted owls” and their critical habitat (a portion of the project is in the 2012 Revised Designated Northern Spotted Owl (NSO) critical habitat [77 Federal Register 233:71876-72068]). The USFWS provided a Biological Opinion (June 25, 2014 BO, Tails #: 01EOFW00-2014-F-0161) stating that the proposed action is not likely to jeopardize the continued existence of the NSO or adversely modify NSO critical habitat.

No other listed wildlife species or critical habitats are affected.

Plants

There are three federally listed plants on the Medford District (*Fritillaria gentneri*, *Limnanthes flocossa* ssp. *grandiflora*, and *Lomatium cookii*). Units within the Douglas Fire Complex Recovery Project do not fall within the range of these threatened and endangered (T&E) plant species, as determined by the 2014 US Fish and Wildlife Service Biological Opinion (Tails # 01EOFW00-2014-I-0013). There would be no anticipated effect from the Selected Alternative on any federally listed plants.

Survey and Manage and Bureau Sensitive Species Compliance

The project is consistent with the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines.

Red Tree Vole

Oregon red tree vole (RTV) (*Arborimus longicaudus*) is a 2001 ROD Survey and Manage species (Category C, survey and manage known sites). RTV surveys were completed to protocol in March 2014. Six RTV active sites were detected in the project area with the current accepted protocol. Ten acre habitat management areas were applied to each site. Harvest related activities will occur within one site-tree potential in four of the six sites, designated as non-high priority sites (BLM-IM-OR-2012-036). A letter was received by the USFWS concurring with the BLM’s assessment that three of the four sites would continue to persist, without full implementation of 2000 RTV Management Recommendations. The fourth site is not expected to persist, due to minimal available habitat (Tails #: 01EOFW00-2014-TA-0201).

Del Norte Salamander

Del Norte salamander (*Plethodon elongatus*) is a 2001 ROD Survey Manage species (Category D, Uncommon, manage known sites) that occurs in talus slopes protected by overstory canopy that maintains cool, moist conditions on the ground. Less than 150 acres of historically occupied talus occurs within proposed units within severe burned areas that no longer provide suitable microclimate habitat conditions for Del Norte salamanders (Welsh and Lind 1995). PDFs such

as retaining all coarse wood, increased snag retention (4snags/acre), application of operational and seasonal restrictions, and minimal ground disturbance will be applied to minimize effects to individuals that may still occur or disperse through the talus. These sites are not expected to contribute significantly or provide for assurance of population persistence within the project area because the Douglas Fire Complex changed habitat conditions, and post-fire conditions retained insufficient ground cover or forest canopy conditions to provide cool, moist conditions on the ground. Large and expansive talus areas are common throughout the planning area, and tend to undulate across slopes and drainages, and improve as it descends toward lower slopes and riparian areas and away from most roads. Limited historical project surveys located salamanders and talus well distributed throughout and adjacent to the planning area with approximately 50% of all detections in riparian reserves. The distribution and population persistence within the planning area will not be changed, with lower slopes and riparian reserves providing the best habitat.

Vascular Plants, Nonvascular Plants & Fungi

Implementation of PDFs will eliminate or minimize direct and indirect effects of the proposed action on Bureau Sensitive and Survey and Manage (S&M) vascular plants, nonvascular plants, and fungi. No Sensitive Status or S&M vascular, nonvascular, or fungi species would trend toward listing (sensitive) or cease persisting (S&M) as a result of implementing the activities proposed in the Selected Alternative.

No Bureau Designated Sensitive or S&M vascular, nonvascular, fungi, or wildlife species would trend toward listing (Bureau Sensitive) or cease persisting (S&M) as a result of implementing the activities proposed in the Selected Alternative.

State Historical Preservation Office Consultation & Tribal Coordination

Cultural

Cultural surveys were completed for the Douglas Fire Complex Recovery Project in accordance with the National Cultural Programmatic Agreement and the Protocol for Managing Cultural Resources on Lands Administered by the BLM in Oregon. Archaeological surveys identified 6 Historic Properties within treatment units. These sites will be protected using Project Design Features (PDFs).

The BLM submitted the Dad's Creek Cultural Report to SHPO for formal review on April 7, 2014 (SHPO Case No. 14-0527) specific to the Dad's Creek Fire survey area. A letter of concurrence was received by the BLM on May 6, 2014. SHPO agreed with the BLM's recommendation that the project will have "No Adverse Effects" to cultural resources. For the Rabbit Mountain survey area, there will be no effect to cultural resources since there are no sites located within proposed treatment units or other areas of potential effect. According to the BLM's working Protocol with SHPO, projects that have no effect to cultural resources do not need to go through the formal 30-day consultation review process. The Rabbit Mountain survey report will be sent to SHPO at a later date as outlined in the Protocol.

The BLM has coordinated with SHPO since the onset of the 2013 fire season and with the following Tribes: Cow Creek Band of Umpqua Tribe of Indians, Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Coos, Lower Umpqua & Siuslaw, Coquille Indian Tribe, and Confederated Tribes of the Siletz Indians of Oregon.

IV. DECISION

Based on my review of the Douglas Fire Complex Recovery Project EA, best available science, comments received from the public, and management direction contained in the Record of Decision and Standards and Guidelines of the Northwest Forest Plan (1994), Medford District Resource Management Plan and Record of Decision (1995), I have decided to authorize a blend of Alternative 2 and 3, known as the Selected Alternative. The Selected Alternative authorizes less ground disturbing activities than those analyzed in the EA. This is a result of reduced road construction and less impactful harvest systems.

This Decision authorizes the salvage harvest of approximately 1,276 acres on Matrix Land Use Allocation. The Decision will incorporate all Project Design Features (PDFs) and Best Management Practices (BMPs) and seasonal restrictions as described in the EA, p. 16-27. Logging operations include ground based, cable and helicopter systems. To facilitate harvest activities, construction of 4.1 miles of temporary route and 102 miles of road maintenance will occur. Temporary routes will be decommissioned after use. No permanent roads will be constructed. Table 1 below represents Alternatives 2 and 3, including the Selected Alternative.

Approximately 50% of the acres in this Decision will receive an additional retention of 4 snags/acre, including retention of all course wood.

Table 1: Selected Alternative, Blend of Alternative 2 and 3

Activities analyzed in the Environmental Assessment		Alternative 2	Alternative 3	Selected Alternative, Blend of Alternatives 2 and 3
Operations Summary	Ground Based	307	264	152
	Cable/Skyline	1,105	924	816
	Helicopter	257	481	308
	Total Acres	1,669	1,669	1,276
Road Construction Summary	Temporary Routes	6.59 miles	3.23 miles	4.1 miles
	Permanent Road	0.32 miles	0.32 miles	0 miles
	Maintenance	180.2 miles	180.2 miles	102 miles

V. DECISION RATIONALE

My rationale for the decision is as follows:

The Selected Alternative meets BLM's obligation to implement the RMP and to address the primary needs identified for lands in the Planning Area, as well as meeting the purpose and need of the project to implement forest management activities.

I have chosen the Selected Alternative, because it will meet all of the elements of the purpose and need. Salvage harvest of 1,276 acres will provide for economic recovery of fire-killed and fire-injured trees within a timeframe that captures merchantable value. The Selected Alternative meets the RMP direction to, "Provide for salvage harvest of timber killed or damaged by events such as wildfire, windstorms, insects or disease, consistent with management objectives for other resources" (RMP, p. 72, EA, p. 6). The Selected Alternative, "helps to ensure that long term forest productivity is recovered, maintained, improved, and/or sustained" (EA, p. 47).

Salvage harvest along 14 miles of road will comply with state and federal safety laws by providing safe travel conditions for the public, contractors and adjacent landowners with reciprocal rights on BLM roads. "Public, forest workers, and fire fighters safety would increase as hazard trees (snags) would be harvested along primary, secondary roads, ridgelines, and within the salvage units" (EA, p. 64).

The Selected Alternative meets the objectives of the project and the RMP to, "Reduce both natural and activity-based fuel hazards" (RMP, p. 91, EA, P. 6). The expected post-harvest fuel loading will vary from 5.5 to 18 tons per acre (EA, p. 64) as compared to the existing 68 to 172 tons per acre (EA, p. 62). "Harvesting fire-killed and fire-injured trees would remove horizontal and vertical fuel loads that would reduce the potential for high intensity wildland fire behavior in the long term, over the next 2 to 4 decades" (EA, p. 64).

Construction of 4.1 miles of temporary route and maintenance of 102 miles of road will accommodate harvest operations. PDFs, BMPs, and seasonal restrictions will result in no instances of chronic erosion or excessive soil displacement (EA, p. 144). No permanent roads will be constructed as part of this project. The Selected Alternative has reduced ground disturbing impacts compared to what was analyzed in Alternative 2 and 3.

The Selected Alternative meets the objectives of the project and the RMP to, "Provide for salvage harvest of timber killed or damaged by events such as wildfire, windstorms, insects or disease, consistent with management objectives for other resources" (RMP, p. 72; EA, p. 6). The silvicultural prescription has additional retention measures specific to Critical Owl Habitat (CHU) and relative high suitability (RHS) areas, high priority owl sites, and occupied Del Norte salamander talus (EA, p. 45). Specifically, the silvicultural prescriptions has identified some site specific retention requirements to maintain a minimum of 4 snags per acre, ≥ 16 inches DBH, and retain all coarse woody debris (EA, p. 45). This additional retention above what the RMP requires will be applied on 53% of the units within this DR. This Decision meets management direction to, "harvest only mortality above the level needed to meet snag retention and other habitat goals and provide desired levels of coarse woody debris" (RMP, p.186; EA, p.6).

I chose not to select the No action Alternative because it would not meet the Purpose and Need of the Project. Under the No Action Alternative, economic recovery, road safety and fire planning objectives would not be met.

This Decision authorizes less ground disturbing activities than what was analyzed in Alternative 2 in the EA. This was a result of reduced road construction and less impactful harvest systems (i.e., replacing cable yarding with helicopter yarding). No permanent roads will be constructed as part of this project.

A Finding of No Significant Impact (FONSI) explains that the Selected Alternative has been analyzed in an Environmental Assessment and found to have no significant impacts, thus an Environmental Impact Statement is not required, and will not be prepared.

VI. ADMINISTRATIVE REMEDIES

In accordance with Forest Management regulations at 43 CFR Subpart 5003 – Administrative Remedies, publication of the first Notice of Sale for the Timber Sales (Rogue Cow, Rock Star and Burnt Rattler) constitutes the decision document for purposes of protest and appeal. Protest of the timber sale decision may be filed with the authorized officer, Allen Bollschweiler, within 15 days of the publication date of the Notice of Sale in the *Daily Courier* newspaper in Grants Pass, the *News Review* in Roseburg, and the *Medford Mail Tribune* in Medford, Oregon. The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error.

43 CFR § 5003.3 subsection (b) states, “Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision.” This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. **Only written and signed hard copies of protests delivered to the Grants Pass Interagency Office will be accepted.** The Grants Pass Interagency Office is located at 2164 NE Spaulding, Grants Pass, Oregon, 97526.

43 CFR § 5003.3 subsection (c) states, “Protests received more than 15 days after the publication of the notice of decision or the notice of sale are not timely filed and shall not be considered.” Upon timely filing of a protest, the authorized officer shall reconsider the project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the protesting party. Upon denial of a protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 5003.3(f).

VII. IMPLEMENTATION DATE

If no protest is received by the close of business (4:30 p.m.) within 15 days after publication of the Legal Notice, the decision will become final. If a timely protest is received, the decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available and a final decision will be issued in accordance with 43 CFR § 5003.3.

VIII. CONTACT PERSON

For additional information contact either Allen Bollschweiler, Grants Pass Resource Area Field Manager, 2164 NE Spalding Ave., Grants Pass, OR 97526, telephone (541) 471-6653; or Leah Schofield, Planning Lead, telephone (541) 471-6504.



Allen Bollschweiler, Field Manager
Grants Pass Resource Area

6/26/14

Date

RESPONSE TO PUBLIC COMMENTS

Comment 1: Areas proposed for treatment will help contribute to meeting the intent of the O&C Act. However, we would have liked to see a more aggressive approach to salvage harvesting on the only land allocation where timber management is an objective.

Matrix objectives for timber management and ESA objectives for northern spotted owl (NSO) recovery will not be achieved due to such a large deferral of salvage.

BLM Response: The EA analyzed two action alternatives to treat 1,669 acres of fire injured and fire killed trees, which meet the intent of the O&C Act. The offering of 33 million board feet will contribute to the local economy. The BLM is required to manage for multiple mandates, in addition to the O&C Act. Management decisions were made to fulfill all purposes and needs of the project, including the O&C Act and to meet the requirements under the RMP to manage for multiple resources.

Comment 2: The deferral of salvage opportunities on 1,115 acres of NSO core areas and on 879 acres of riparian reserve is disappointing.

BLM Response:

Northern spotted owl cores

The Douglas Fire Complex perimeter occurs where NSO demographic surveys have been carried out over the last 20 years. The interdisciplinary team, in early consultation process with the USFWS, took a hard look and evaluated all NSO sites using the demography survey data based on Recovery Action 10 and 12 principles. Sites with high occupancy and reproduction history were eliminated from detailed analysis to reduce adverse effects. Elimination of the 1,115 acres from consideration for harvest still provides for an economically viable timber sale, while managing for the NSO (EA, p. 12).

Riparian Reserves

A management decision was made not to incorporate an accelerated restoration strategy under this project, and therefore not to salvage for economic recovery within riparian reserve under this project (EA, p. 11). The BLM is aware of the current condition of the riparian reserves and is considering a future restoration project.

Salvage for economic recovery in riparian reserves is not part of the purpose and need of this EA.

Comment 3: The BLM should look at both the short-term and the long-term effects and benefits to all their management goals, including NSOs. In the long term, the deferred areas will not achieve species diversity goals, will not establish fire-resilient species, and will not provide quality NSO habitat.

BLM Response: Approximately 7,000 acres are planned for planting on riparian reserves and Matrix lands within the fire perimeter, occurring outside of this project. These foreseeable actions would support species diversity goals (EA, p. 252).

Comment 4: Matrix objectives for timber management and ESA objectives for NSO recovery will not be achieved due to such a large deferral of salvage.

BLM Response: A total of 48,671 acres were affected on multiple land ownerships from the Douglas Fire Complex (EA, p. 2). 19,082 of those acres occurred on Medford BLM-managed land. 14,286 of those acres burned at low severity. The remaining 4,783 acres burned at moderate to high severity, which in turn was evaluated to meet the prescription and other conditions. Treatment areas were developed using a combination of post-fire aerial photo analysis, soil and vegetation burn severity models and ground reconnaissance. Alternative options were considered, but eliminated from detailed analysis (EA, pp. 10-12). The BLM has made extensive efforts to provide forest resources to contribute to local and regional economies (RMP, p. 80; EA p. 5). The actions proposed in Alternatives 2 and 3 to treat 1,669 acres of fire-injured and fire-killed trees meets the purpose and need for the project and the intent of the O&C Act.

Comment 5: Aquatic Conservation Strategy objectives will not be met in riparian reserves because species diversity and fire resilient forests may not be achievable without the use of salvage harvesting. Not salvaging in riparian reserves is fatally-flawed, as stated in the No Action Alternative in the EA.

BLM Response: Salvage for economic recovery in the riparian reserves is not part of the purpose and need of this EA.

The EA provides an ACS assessment and determines ACS objectives would be met by not harvesting in riparian reserves in this project (EA, p. 242). The BLM is aware of the current condition of the riparian reserves and is considering a future project to meet ACS objectives.

Comment 6: Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment, such as processors and fellerbunchers in the units to make cable yarding more efficient. Allowing the use of this equipment throughout the units can greatly increase its economic viability.

BLM Response: The RMP limits ground-based equipment to slopes less than 35%. In ground-based units, mechanical harvesting equipment is allowed in this project. The purpose and need of the project is restore timber productivity on O&C Matrix lands and meet reforestation objectives as defined by the 1995 RMP.

Comment 7: The ability to yard and haul timber in the winter is important, and may make the difference between our ability to sell or not to sell timber. This is why we are confused with the seasonal restriction placed on cable yarding on slopes over 70%. It seems this restriction is in response to a concern that cable roads on steep slopes could potentially deliver sediment laden water to live streams. We find that highly unlikely given the full no-touch riparian reserves placed on every stream as well as the multitude of mitigation measures available to trap and

redirect channelized water if it does occur. We encourage the BLM to heed the analysis completed in this EA and remove this unnecessary restriction.

BLM Response: The fire resulted in varying degrees of soil burn severity (EA, p. 133). Seasonal restrictions placed on cable yarding on slopes over 70% are incorporated to reduce potential sediment transfer as a precautionary measure to meet the Clean Water Act. Project Design Features (PDFs) provide for flexibility in the dry and wet seasons. This includes authorizing dry condition operations during the wet season for cable units with slopes less than 70% (EA, p. 18). The BLM felt there would be enough opportunities to yard and haul timber on slopes less than 70%.

In regards to hauling, there are no additional restrictions outside of what would be planned in a normal timber sale, specifically a storm event that results in ½ inch or more precipitation within a 24 hour period (EA, p. 246).

Comment 8: The BLM has failed to consider an alternative that treats all matrix acres, including within riparian reserves and NSO core areas. This is a NEPA violation.

Prohibiting salvage over 91% of the burned area inhibits the mandatory timber production requirements of the O&C Act.

BLM Response: The BLM analyzed for a reasonable range of alternatives within the purpose and need of the project and NEPA regulations.

A total of 48,671 acres were affected on multiple land ownerships from the Douglas Fire Complex (EA, p. 2). 19,082 of those acres occurred on Medford BLM-managed land. 14,286 of those acres burned at low severity. The remaining 4,783 acres meeting the definition of salvage in the RMP (p. 112) burned at moderate to high severity, which in turn were evaluated to meet the prescription and other conditions. Approximately 3,114 acres (65% of salvageable acres) were dropped from consideration for a variety of reasons (EA, pp. 11-12). Treatment areas were developed using a combination of post-fire aerial photo analysis, soil and vegetation burn severity models and ground reconnaissance. Alternative options were considered, but eliminated from detailed analysis. The BLM has made every attempt to maximize economic recovery for the community. The actions proposed in Alternatives 2 and 3 to treat 1,669 acres of fire-injured and fire-killed trees meets the intent of the O&C Act.

Comment 9: The BLM has not included any meaningful analysis of effects to local economies and communities. The BLM has also failed to analyze the impacts to County payments, now that the Counties have transitioned back to 50% shared receipts, and the O&C Counties have nearly no ability to replace lost revenue with other sources of revenue. This is a NEPA violation.

BLM Response: The BLM recognizes the issues in the local economy and community. The commenter is correct – a thorough economic analysis was not referred to in the EA, although this project would contribute to O&C county revenue. The BLM has made every attempt to maximize economic recovery for the local and regional communities.

Comment 10: The EA should note that O&C lands have a statutorily designated dominate use, which is the production of timber on a sustained yield basis for the purpose of providing revenues for Counties. “Recreation and Visual Resource Management” is not independent of, or in competition with timber production. Recreation is a secondary use and timber production must not be sacrificed to accommodate it.

BLM Response: The BLM recognizes that the O&C lands have a statutorily designated dominate use. The analysis was performed in compliance with NEPA regulations. No acres were removed from the analysis for Recreation and Visual Resource management.

Comment 11: Safe, long-term access must be assured on forest roads in BLM fire-damaged stands. This means regeneration salvage harvest and reforestation should be planned for 300 feet on each side of the road.

BLM Response: The EA analyzes for salvage harvest for economic recovery and road safety along 14 miles of roads (EA, p. 13) according to the guidelines identified in the 2008 Field Guide for Danger Tree Identification and Response. Identification and removal of imminent hazard trees among the remaining roads within the fire perimeter are occurring. The BLM cooperates with private landowners to assure safe conditions for access to and work on their lands.

Comment 12: Fire-safe, property boundaries must be assured along fire-damaged BLM stands. Specifically, salvage harvest should be planned for 300 feet within the BLM side of private property boundaries in BLM fire-damaged stands.

BLM Response: Some of the units analyzed for treatment are adjacent to private property lines. Hazard tree removal occurs outside of this project and upon request and BLM identification of hazard trees.

Comment 13: The salvage-harvest of all snags should be planned for the upper two-thirds of slopes in the BLM fire-damaged stands of the project area.

The number and locations of snags left on the post-fire landscape should be limited. Snags should be strategically located in clumps of one acre or less. The purchaser should be able to select snags to fell, as required by OR-OSHA.

BLM Response: The snags required are for wildlife needs and to meet RMP snag and coarse wood requirements. The prescription allows for flexible strategic snag retention methods for snag placement. The prescription allows for strategic snag retention methods. The timber sale contract allows for snag locations to be determined by the operator.

Comment 14: Critical infrastructure must be sustained investment in importance maintenance, repair, improvement, and protection measures.

BLM Response: As standard practice associated with timber sales, BLM road infrastructure used to implement this project would be sustained across the project area. Road construction activities connected to Alternatives 2 and 3 include maintenance,

repair, improvement, and protection measures. Maintenance activity would occur on approximately 180 miles to keep the road at its original design standard (EA, pp. 15-16).

Comment 15: Harvesting large, old trees (both dead and dying) is necessary for the project to be feasible, to meet purpose and need, as well as to accomplish all the desired resource, reforestation, and safety objectives.

BLM Response: The prescription would require that a minimum of 2 dead/dying trees (snags) per acre would be retained on average across each project unit. Retained snags would generally be grouped in clusters and would reflect the species mix of the original stand. Emphasis would be placed on retaining the largest snags available (EA, p. 14).

Comment 16: Reforesting this large landscape-scale fire killed forest is an urgent priority. The long-term sustainability of these forests depends upon prompt and successful reforestation.

BLM Response: The EA includes PDFs to provide for prompt site preparation to expedite reforestation (EA, pp. 14, 23). Approximately 5,000 – 7,000 acres will be planted within the Douglas Fire Complex (EA, p. 252).

Comment 17: Conventional logging with sufficient road access is more economical and environmentally rational than helicopter yarding. The NEPA decision should incorporate a full range of modern harvest technologies, rather than prescribing one very limiting method. Access to the site is very limiting. Sufficient road developments are necessary, and the NEPA decision document should reflect that.

BLM Response: Per the EA analysis, the BLM is designating harvest techniques appropriate to site-specific conditions. The EA analyzed for a full range of modern harvest technologies. Detailed EA maps, including harvest and access proposal is available on the Medford BLM planning site and upon request.

Comment 18: Economic feasibility relies on rapid salvage harvest of significant volume. Salvage must be accomplished within 8-18 months.

BLM Response: The BLM has made a concerted effort to offer viable timber sales within this time period in conformance with applicable laws.

Comment 19: There is sufficient social and scientific controversy necessitating completion of an Environment Impact Statement.

BLM Response:

Social Controversy

The BLM disagrees that significant social controversy exists in this project. Only six individuals and/or organizations submitted comment letters during the EA public comment period. Four out of the six largely support the actions proposed in Alternatives 2 and 3. Recently, the 2014 Josephine County Election asked citizens, “should federal agencies maximize salvage harvesting of dead and dying timber and replant areas

damaged by wildfires?” Of the 27,119 people that voted, over 89% voted YES for maximum salvage on federal lands following wildfires. The BLM notes the overwhelming support from the public and organizations, but also recognizes opposition.

Scientific Controversy

The purpose and need of this project is to provide for economic recovery, road safety, and fire planning—not ecological restoration or recovery. The majority of existing science on post-fire salvage activities is specific to ecological effects in terms of restoration, which does not apply to this project. The commenter claims scientific controversy exists, but does not provide supporting information as to how the EA is in error based on the science used to support the findings in the EA. The 1994 Northwest Forest Plan Environmental Impact Statement/1995 Resource Management Plan provides for salvage on fire-damaged lands.

Comment 20: Incorporation of literature submitted during scoping.

BLM Response: The BLM considered all the scientific literature received during the scoping period. The majority of the science revolves around ecological restoration, which is not a driving element in the purpose and need of this project. The BLM does not question the validity of the science submitted and in fact does reference and incorporate the science that is applicable to the purpose and need of the project. The majority of existing science on post-fire salvage activities is specific to ecological effects in terms of restoration, which does not apply to this project. The commenter does not describe how the EA is in error by not referencing all of the literature provided by the commenter during the scoping period.

Comment 21: Consider an alternative based on recommendations on the Beschta Report.

BLM Response: The BLM acknowledges the recommendations in the Beschta report (Beschta, et. al. 1995). However, the Beschta report emphasizes ecological goals over economic recovery, but objective of economic recovery post-fire in the matrix was a call already made in the 1995 RMP, and is not related to the decision being made in this project. The BLM implements Project Design Features and Best Management Practices (BMPs) that minimize soil erosion and compaction, and minimize negative effects to riparian reserves and NSO habitat, while at the same time providing much needed salvage timber for economic restoration in nearby communities.

Comment 22: Plantations increase future fire behavior, and the significant impacts of such a proposal must be documented in an Environmental Impact Statement, rather than an EA.

BLM Response: The BLM acknowledges that new plantations increase fire hazard (EA, pp. 65-66). This project does not propose establishing new plantations with planting activities. However, future ESR projects would include tree planting in their proposals, as mentioned in the EA Cumulative Effects analysis (EA, p. 49). BLM acknowledged in the EA that naturally regenerated stands would exhibit the greatest amount of live fuels for the longest duration; Naturally regenerated stands would continue to accumulate the live fuels of shrubs, brush and hardwood sprouts as they are the least likely to receive

density reduction treatments that reduce competing vegetation. Tree plantations, on the other hand, are maintained with treatments that reduce competition with conifers, such as brushing, pre-commercial thinning, and other fuel reduction treatments. These density reduction treatments protect tree planting investments from competing vegetation as well as reducing live fuels within the plantation. The BLM tree planting program would also utilize fire resilient conifer species (EA, pp. 35-40). Within these young stands, plantations and naturally regenerated sites would see an initial increase in fire behavior. As these stands mature, fire severity would decrease and fuel loading and ladder fuels would be reduced through competition for space, moisture, light and nutrients but over the long-term the fire resilient conifer would dominate over the shrub fuel model. The threat of fire diminishes over time within plantations as competing vegetation is reduced and conifers are cultivated into larger diameter trees (EA, p. 35). The implementation of PDFs and BMPs (EA, pp. 16-27) would reduce fire hazard within salvage harvest units in the short term. Reforestation activities would be consistent with the impact analysis and conclusions provided in the 1994 Medford RMP/EIS.

Comment 23: Salvage logging would increase fuel loading leading to an increase in fire hazard.

BLM Response: Under the No Action Alternative, the EA determined that site potential fuel loading would vary from 68 to 172 tons per acre (EA, p. 62). The expected post-harvest fuel loading would vary from 5.5 to 18 tons per acre (EA, p. 64). Analysis provided by the resource professionals in the EA indicate that fuel loading from salvage would not increase.

Comment 24: The BLM ignores project impacts on bird species despite the fact that it intends to conduct logging activities near roads such that the project “may not meet RMP 40% mean number of snags of unentered stands for in these areas along roads” (EA, p, 114).

BLM Response: The BLM’s proposed actions are within RMP guidelines to meet 40% population level cavity nesting birds. Non-discretionary actions are exempt from the RMP guidelines.

The commenter takes the reference to EA page 114 out of context. The statement is referring to cumulative effects of non-discretionary road safety actions. The RMP reference that may not meet 40% mean number of stands is not an indirect or direct effect from any of the action alternatives analyzed in this project. It is a reference to the non-discretionary road safety actions to meet OSHA requirements that BLM must include within the context of its cumulative effects analysis for the proposed action. The BLM does not have discretion to keep hazards under non-discretionary reciprocal rights-of-way agreements in the project area.

Comment 25: The project proposes logging, yarding, and hauling on Timber Productivity Capability Classification restricted and withdrawn soils. Impacts are significant.

An EIS is required to study and disclose potentially significant cumulative effects of post-fire logging and road use on severely burned soils.

BLM Response: The EA discloses impacts to soils and does not include proposed actions on Timber Productivity Capability Classification Fragile Non-Suitable Woodlands-withdrawn soils, nor would they occur on other non-suitable woodland categories (EA, p. 16). The EA identified 2,271 acres as Non-suitable Woodland, all of which was taken out of consideration for treatment (EA, p. 124). On TPCC restricted and withdrawn categories, salvage would occur on approximately 40 acres to reduce deadwood densities to provide near and long-term resilience and resistance of forest to future fire or for road system management. All tractor and cable yarding activities would be restricted to the dry season (EA, pp. 16-26) which adheres to the recommended practices in BLM's Updated Guide of the Standard Operating Procedures for Upland Soil Productivity in Western Oregon (2010). Salvage would adhere to the 1995 RMP by facilitating temporary route construction of roads, provide more logical logging units, lower risk of future fire intensities at the stand and landscape scale, and would be applicable to all land use allocations (EA, p. 124). The increased level of coarse woody debris was incorporated as PDFs to enhance soil stability on unstable slopes. In units with restricted and withdrawn categories, this would help impede soil movement (EA, p. 17).

Comment 26: The cumulative effects from private commercial logging necessitate an EIS.

BLM Response: A thorough analysis was performed considering the best available information on private and federal lands. This includes proposed activities on the Roseburg BLM District and private lands. Appendix C of the EA provides projects considered for cumulative effects analysis, including private activities and proposed activities on Roseburg BLM-managed land within the fire perimeter (EA, p. 251). Under BLM's NEPA Handbook (H-1790-1), p. 72, BLM considers only those actions over which it has discretionary control in evaluating the "significance" of the agency's contribution to overall cumulative effects. Because BLM does not have discretionary control over the actions of private commercial logging in the area, BLM was not required to perform an EIS for the impacts of the proposed action when considered within the context of impacts from those private activities.

The 1994 Medford District PRMP/EIS assumed that for analysis of cumulative effects, most private forestlands would have to be intensively managed with final harvest on commercial economic rotations averaging 60 years (1994 PRMP/EIS Vol I, Chapter 4-5).

Comment 27: Post-fire logging with high-impact ground based systems will significantly increase erosion on severely burned soils.

BLM Response: The actions analyzed in Alternatives 2 and 3 incorporate PDFs, BMPs, and seasonal restrictions (including tractor logging only in the dry season) into the project to eliminate or minimize adverse effects to all resources (EA, pp. 16-27).

Best Management Practices and PDFs were then identified and incorporated to address the remaining general management concerns: "Field surveys were used to identify and defer all areas that have the potential to result in chronic erosion, excessive soil displacement, or landslides as a result of this project" (EA, p.137). Additionally, the

increased level of coarse woody debris was incorporated as a PDF to enhance soil stability on unstable slopes. In units with restricted and withdrawn categories, this would help impede soil movement (EA, p. 17).

There would be no instances of chronic erosion or excessive soil displacement that would occur as a result of this project (EA, p. 144). The magnitude and extent of soil erosion would be consistent with the impact analysis and conclusions provided in the 1994 Medford RMP EIS (EA, p. 145).

Comment 28: There is logging green tree patches (1/4 acre) in watersheds that exceed open space thresholds.

BLM Response: Individual and small groups of trees may only be removed where roads and landings are proposed. Roads and landings would avoid green trees within 180 year or older stands, would not be continuous and within all except the Dads Creek and Riffle Creek subwatersheds, would not result in enough total open space to exceed established thresholds.

Within Dads Creek and Riffle Creek subwatersheds, green tree removal would be limited to less than 1/4 acre in size (EA, pp. 17, 22, 167). Generally, canopy openings greater than two acres affect precipitation, snow interception, and snowmelt. Areas smaller than two acres generally do not experience peak flow enhancement. Given the sensitive nature of the soils and the high ECA, we chose the 1/4 acre size in order to ensure the ECA is not increased.

When the effects to soils from Alternative 2 are added cumulatively with all other discretionary actions occurring in this planning area, the magnitude of the impacts to soil function and extent of soil erosion would remain consistent with the impact analysis and conclusions provided in the 1994 Medford RMP EIS (EA, p. 145).

Comment 29: The EA does not analyze the impacts of proposed activities on the spread of noxious weeds in any meaningful way.

The conclusions in the EA are not enough to warrant a Finding of No Significant Impact by the BLM.

BLM Response: Several factors affect the rate at which noxious weeds spread, especially on matrix land, including: activities on private land, motor vehicle traffic, recreational use, rural and urban development, and natural processes. To predict the rate of noxious weed spread as a result of the proposed activities in this EA would be highly speculative (EA, p. 212).

The BLM acknowledges the potential for salvage activities to increase instances of noxious weeds. However, PDFs provide for minimizing the potential spread of noxious weeds through the cleaning of all logging equipment prior to entry on BLM lands (EA, p. 17). Landings would be partly winterized by properly installing certified weed-free hay bales, wood straw, small dense woody debris, seeding, and/or mulching (EA, p. 20).

Emergency stabilization funds have been secured to fund a BLM noxious weed crew tasked with documenting and treating noxious weed sites within the fire perimeter for one year. After one year, funding will be reassessed and could be authorized for up to two additional years. This funding and the associated task of locating and treating noxious weed populations within the Douglas Complex wildfire perimeter would occur regardless of implementation of proposed salvage activities (EA, p. 211).

Comment 30: Why does the EA allow for the felling of hazard trees 500 feet above roads, yet require only a 400 feet buffer on streams?

Page 178 of the EA indicates that the BLM intends to log so-called “hazard trees” up to 2.5 tree lengths above logging roads, which will involve logging up to 500 feet above roads. The BLM intends not to comply with project BMPs the ACS, ESA or the CWA when conducting this commercial logging.

BLM Response: The EA analyzes for 1,669 acres of salvage meeting objectives for economic recovery, road safety and fire planning. The units proposed are in compliance with PDFs, BMP, ACS, ESA and the Clean Water Act. The BLM is in compliance with the above regulations.

RMP standards for riparian buffers provide for Large Woody Debris to remain within 200 feet from stream channels (RMP, p. 174). The EA provides for a 400 foot buffer on either side for fish bearing streams (EA, p. 179). The discrepancy between potential travel for large woody debris differentiates between roads and streams because of safety concerns, not because of any difference of the ability of wood to travel downhill further toward a road than toward a stream. RMP guidelines are exempt from non-discretionary actions. The BLM does not have discretion to keep hazards on the lands in violation of OSHA regulations.

Comment 31: Burned forests provide important wildlife habitat. Why does the BLM propose to salvage such important wildlife habitat?

The black-backed woodpecker, rarely seen outside of stand-replacement burns, requires severely burned, unlogged conifer forests. Post-fire logging would reduce this important habitat type for the black-backed woodpecker.

BLM Response: The BLM acknowledges the potential for burned forests to provide important wildlife habitat. Rather than leaving the RMP minimum of 2 snags per acre > 16 inch DBH (emphasizing the largest available), PDFs provide for retaining of a minimum of 4 snags per acre >16 inch Diameter Breast Height (emphasizing largest available) within NSO Critical Habitat, talus historically occupied with Del Norte salamanders, and selected NSO Cores (Table 5, EA, p. 25). If retained snags had to be felled because of safety concerns, they would remain on site (EA, pp. 24-25). Additional burned habitat would be retained for primary cavity nesting birds such as woodpeckers (EA, p. 111).

The black-backed woodpecker is currently a BLM sensitive species, which is not expected to occur in the project area. It is expected to occur in pine-dominated forests

which do not occur in project units. (90-Day Finding on a Petition to List Two Populations of Black-Backed Woodpecker as Endangered or Threatened, Federal Register, Volume 78 Issue 68 (Tuesday, April 9, 2013) [Pages 21086-21097].

Approximately 1,500 acres of moderate and severe burned mature and older burned forest areas that is dispersed adjacent to treatment areas, including untreated riparian areas, withdrawn unsuitable/fragile harvest areas, burned 100 acre owl core areas, and light to moderately burned areas untreated but with new fire-killed trees, would provide high levels of snag habitat. Populations of primary cavity nesting birds (woodpeckers) and other benefitting snag users are expected to be sustained in the planning area and remain stable (EA, p. 111).

Large wolf trees or trees with heavy branching or poor form would be targeted for retention because they provide habitat for numerous wildlife species. Snags that exhibit a greater chance of remaining on the landscape and surviving future windstorms would also be targeted for retention, where safety allows (EA, p. 14).

Comment 32: The BLM is negatively affecting 13 known NSO sites. This will result in “take” determination from the USFWS and should trigger a “jeopardy” determination under the ESA.

Page 113 of the EA acknowledges that the combined cumulative impacts of also logging the adjacent Rabbit Mountain Late Successional Reserve will adversely impact threatened owl populations.

BLM Response: The proposed action has applied in particular, the Revised Recovery Plan Recovery Action 10 to reduce effects and conserve NSO sites and high value NSO habitat (EA, p.104). Spotted Owl Recovery Action 12 was also applied “Existing post-fire levels of large down wood would be retained in owl core areas with recent reproduction and known pairs, and in spotted owl critical habitat units in lower and midslope units. Large snags would be increased to 4 snags per acre in these areas also. Retaining these habitat legacy components in treatment areas, in addition to untreated riparian reserves, and other deferred areas >80 years old that were burned, provides important habitat elements for future spotted owl habitat. Approximately 64% of moderately and severely burned forest >80 years old within the Douglas Fire is outside of the proposed action.” (EA p. 104).

The BLM acknowledges that approximately 14 known owl sites may be adversely affected. The BLM has consulted with the USFWS on adverse effects of removal of burned forest stands and associated minor NRF habitat removal to NSOs. The USFWS performed a Jeopardy Analysis in their Biological Opinion and determined that the proposed action is not likely to jeopardize the continued existence of the NSO.

Cumulative effects from Post Fire Foraging (PFF) habitat removal may have negative effects, and may adversely affect

5 NSO sites (#0919, 1989, 1911, 2298, 2622) not adversely affected by Douglas Salvage Recovery. Cumulative effects from PFF habitat removal may have negative effects, and may adversely affect these NSO sites (EA, p.113).

Medford BLM included these cumulative effects in the cumulative effects analysis for this proposed action. In addition, the Roseburg BLM will analyze the direct and indirect effects of Projects proposed within the Rabbit Mountain Fire and the Rabbit Mountain Late-successional reserve in an EA, including considering the effects of this action within the context of that proposed action's cumulative effects analysis. The adverse effects to the affected owl sites in the EA for these projects will also be analyzed by the Roseburg BLM EA. The Roseburg BLM will also be consulting on the effects to the NSOs and to critical habitat units with the USFWS in a future project.

Comment 33: Structurally diverse, early-seral habitat:

We remain perplexed why the BLM Douglas Salvage logging proposal is called a “recovery project” by the agency.

BLM Response: The commenter seems to be confused regarding the title of the project. The purpose and need of the project is to provide for economic recovery, while managing for multiple resources. The commenter's interpretation of recovery seems to be specific to ecological recovery or restoration of forest ecosystems, as does the majority of the science submitted by the commenter.

Comment 34: The impacts to green trees are likely to be significant. Page 198 of the EA indicates that over 25% of the proposed “salvage” logging is going to occur within unburned and lightly burned forest stands in which logging is in no way needed for “recovery.”

BLM Response: Green tree removal may be required to facilitate access or operations for salvage harvest. The prescription is to harvest trees that are dead or dying affected from the fire. The commenter states that “Page 198 of the EA indicates that over 25% of the proposed ‘salvage’ logging is going to occur within unburned and lightly burned forest stands.” The commenter is in error.

PDFs are incorporated to minimize the amount of green tree removal (incidental removal). As disclosed in the description in Conditions of post-fire affects, units were determined by post fire models (soil burn severity and vegetation mortality) (EA, p. 13). The referenced figure of 25% represents the BAER soil-severity mapping, not what is being considered for harvest.

PDFs provide for the elimination or reduced effects to green trees including: “New landings would not be constructed in green tree stands over 80 years old” (EA, p. 20). Areas that would have resulted in high amounts of green tree removal were deferred due to associated adverse effects to NSO (EA, p.12). Units that didn't meet these PDFs were eliminated from analysis.

The IDT made ample attempts to mitigate green tree removal, especially in sensitive watersheds. Within the already sensitive Dads Creek and Riffle Creek subwatersheds, PDFs limit the green tree removal area to less than ¼ acre in size to ensure that ECA is not increased (EA, p.170).

The commenter does not describe how removing green trees to facilitate logging operations is in violation of the RMP.

Comment 35: Survey & Manage Species:

The BLM's proposal not to provide the required one tree length buffer around occupied known red tree vole sites is in error.

The proposal to impact up to 15% of occupied Del Norte salamander sites via cable yarding necessitates disclosure of the potential impacts of this practice and completion of an EIS.

The EA indicates that the project may negatively impact several Survey & Manage species, including the red tree vole, Interagency Special Status and Sensitive Species Program (ISSSSP) and S&M plants, fungi species, and Del Norte salamander.

The BLM may not mark Survey & Manage buffers with flagging. This proposal to impact these important species necessitates the completion of an EIS.

BLM Response: The intent of the Survey & Manage program is to locate and manage rare and uncommon species within suitable habitat. Survey & Manage surveys are required only when suitable habitat is affected. If a Category A, B, C, D, or E species is located during pre-disturbance surveys, it is the manager's decision whether to apply discretion measures. The BLM has not conducted botanical surveys on 26% of the Planning Area because it is no longer suitable habitat and therefore not required.

For example, approximately 150 acres of previously occupied talus occurs within proposed units within severe burned areas that no longer provide suitable microclimate habitat conditions for Del Norte salamanders (Welsh and Lind, 1995). These sites are not expected to contribute significantly to population persistence within the project areas. The Douglas Fire Complex changed habitat conditions, and post-fire conditions retained insufficient ground cover or forest canopy conditions to provide cool, moist conditions on the ground. Salamanders may still occur in the severe burned areas where rock talus depth was sufficient to protect from heat and smoke and depleted oxygen. However, the change in surface conditions is likely to result in reduced surface activity due to less cover, food, and increased climatic extremes and reduced numbers of adults. These sites no longer meet suitable habitat criteria to provide assurance for site persistence.

Application of PDFs reduces effects to historical habitat and salamanders that may occur (EA, pp. 25, 79). Large and expansive talus areas are common throughout the planning area, and tend to ungluate across slopes and drainages, and improve as it descends toward lower slopes and riparian areas and away from most roads. Limited historical project surveys located salamanders and talus well distributed throughout and adjacent to the planning area with approximately 50% of all detections in riparian reserves. The distribution and population persistence within the planning area will not be changed, with lower slopes and riparian providing best habitat.

The 2001 ROD Survey & Guidelines (S&Gs) for Amendments to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines provides for

the local line officer to identify non-high priority sites on a case-by-case basis (2001 ROD S&Gs, page 10). Non-high priority sites are not needed for species persistence and do not require site management. However, the BLM has only recommended to harvest within buffers for four sites, and three of four are expected to persist and a fourth site is not likely to persist due to high burn severity and past harvesting. A 10 acre habitat area would be incorporated for each of these sites. The BLM shared this proposal with the USFWS, USFS, and the BLM state office technical expert to delineate four active Red Tree Vole sites within the project area as non-high priority as outlined in the Identification of Non-High Priority Sites Process BLM-IM No. OR-2012-036. The BLM received written concurrence from the USFWS.

Page 203 of the EA also indicates that for plant and fungi site protection, if the BLM does not mark buffers with flagging, virtual buffers would be provided on a map. Either technique would help to provide awareness of the site and to prevent action within the buffer radius that would jeopardize species persistence (EA, p. 203).

“Past field survey data within adjacent acres, coupled with probable post-fire suitable habitat potential was analyzed and the resulting information was used to identify and defer most areas that have the potential for suitable habitat and/or site (specific to ISSSSP and S&M plant and fungi species) degradation as a result of this project. It is expected that the implementation of said PDFs will eliminate or minimize direct and indirect effects of this proposed project on ISSSSP and S&M vascular, nonvascular, and fungi species within the project area” (EA, p. 206).

In instance of a temporary road or landing, we specifically chose PDFs that fine tune what could and could not be done. PDFs ensure that the BLM does not operate in areas where we would need to do surveys. All required surveys have been completed according to Survey & Manage protocol.

Comment 36: Non-Survey & Manage Species:

The BLM’s refusal to analyze and disclose the impacts of the project on Primary Cavity Nesting Birds is in error.

BLM Response: Refer to the response to comment 31 for snag abundance across the landscape and in treatment units.

Primary cavity nesting birds that may occur in forested habitat within the project area include acorn woodpecker, red-breasted sapsucker, downy woodpecker, hairy woodpecker, northern flicker, and pileated woodpecker (Marshall et al. 2003) (EA, p. 85).

A minimum of two snags per acre >16 inches diameter breast height, of the largest available, representative of the species of the stand, averaged over no larger than 40 acres (RMP, p. 40) would be retained in units where sufficient snags are available, to meet 40% population level levels (Neitro et al. 1985; Thomas et al. 1979; Bunnell 2013) (EA p. 111).

With the majority of fire-created snags retained in the Douglas Complex Fire outside of proposed units, and 2 to 4 snags per acre of largest available trees in proposed units, the proposed action would meet or exceed 40% population level within proposed units and adjacent area, and result in sustained woodpecker population levels within the planning area (EA, p. 111). With snag quantity and distribution across the treatment units and planning area, meeting or exceeding RMP requirements for primary cavity nesting species, a detailed effects analysis of impacts is not necessary.

EA p.80 states, “Medford 1995 RMP guidance states, “Manage for the conservation of Federal candidate and Bureau-sensitive species and their habitats so as not to contribute to the need to list, and to contribute to the recovery of the species.” Per BLM Manual 6840 (Section .06), Bureau Sensitive Species will be managed consistent with species and habitat management objectives in land use and implementation plans to promote their conservation and to minimize the likelihood and need for listing under the ESA or other provision of the BLM Manual 6840.02. The RMP requires that the BLM manage, over time and across the landscape, so as to not contribute to the need to list a species, and not for every action, to contribute to the recovery of the species.”

Comment 37: Why is the BLM planning two EAs on two Districts for one fire?

BLM Response: The extent of the Douglas Fire Complex affected BLM-managed land on the Medford and Roseburg District. Roseburg fire affected lands are managed within the Late Successional Reserve (LSR) Land Use Allocation (LUA). Medford fire affected lands are managed within the Matrix LUA. Given the inevitable deterioration of fire killed or damaged trees, the Medford Matrix project warranted expedited timeframes to recover any merchantable material. The Roseburg LSR project is managed under different, more time consuming conditions, for example the completion of an LSR Assessment prior to any proposed activities. In summary, the projects are driven by different LUAs, purpose and needs, are on separate districts and different timeframes. The Medford district obtained the best available information from Roseburg for considering cumulative effects specific to post fire recovery actions. The BLM disclosed and analyzed cumulative effects in the EA (p. 66, p. 114, p. 119, 127, 256). Similarly, the Roseburg District will consider the effects of this project within the context of the cumulative effects analysis of its LSR project.

Appendix B

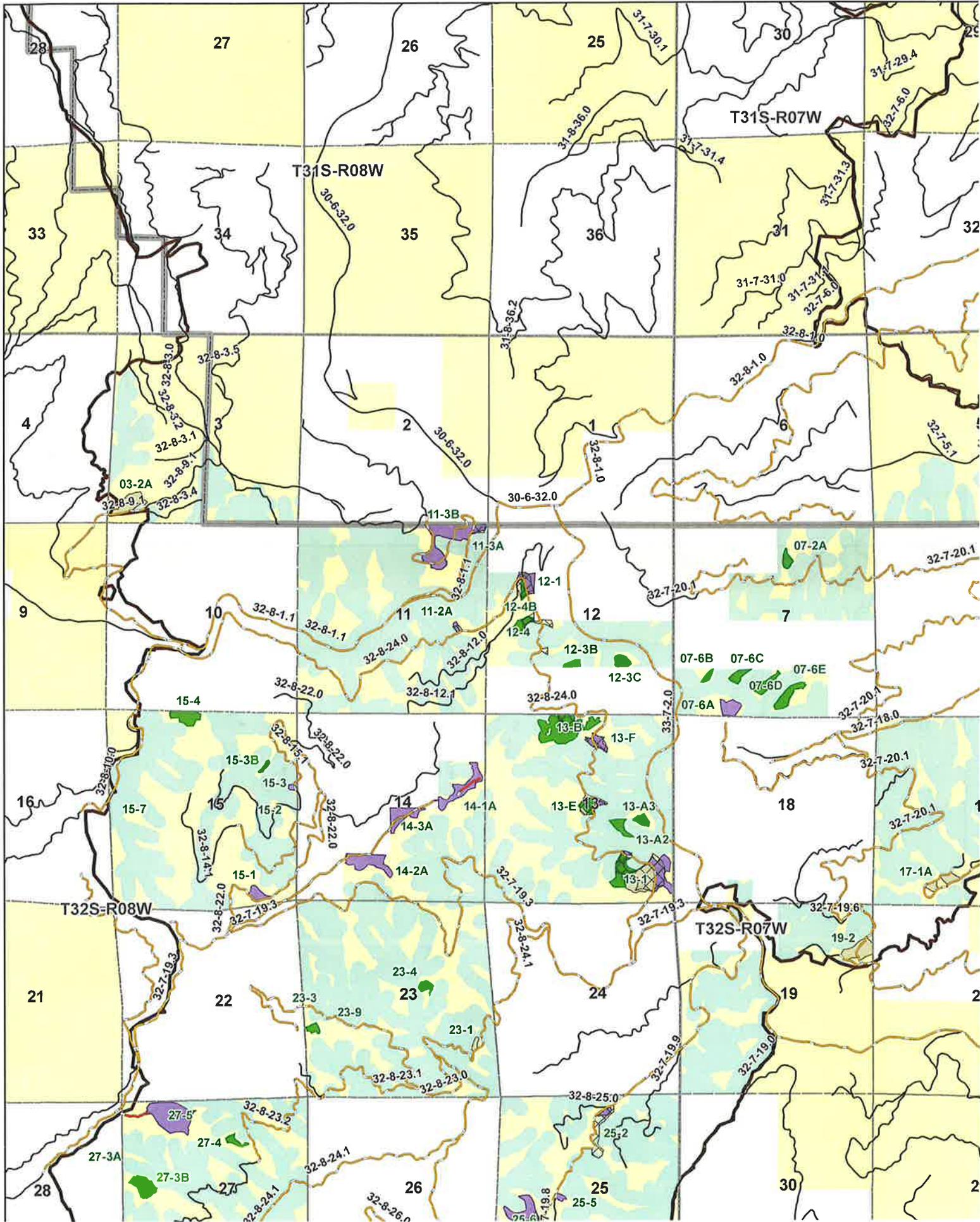
Selected Action Unit Information								
Unit reference				Logging System			Road Construction	
EA Unit	Timber Sale Prospectus Unit	Timber Sale	Unit Acres	Ground Based	Cable/Skyline	Helicopter	Temporary Route Construction (miles)	Temporary Route Reconstruction (miles)
03-1	1	Rockstar	133	16	70	47		
03-2A	7	Rogue Cow	6.1	6.1	0	0		
07-2A	1	Rogue Cow	2.2	0	0	2.2		
07-6A	1	Rogue Cow	4.4	0	4.4	0		
07-6B	1	Rogue Cow	1.1	0	0	1.1		
07-6C	1	Rogue Cow	2.5	0	0	2.5		
07-6D	1	Rogue Cow	3.8	0	0	3.8		
07-6E	1	Rogue Cow	5.1	0	0	5.1		
09-1	2	Rockstar	37	0	25	12	0.37	
09-1A	2	Rogue Cow	1	0	1	0		
09-1D	3	Rockstar	22	3	19	0	0.037	
09-2	Special Mark	Rockstar	5	0	0	5		
09-2A	2	Rogue Cow	0.8	0	0.8	0		
09-4	09-4	Burnt Rattler	12	0	12	0		
09-5	09-5	Burnt Rattler	3	1	2	0		0.08
09-5A	2	Rogue Cow	2.9	0	2.9	0		
09-6A	2	Rogue Cow	4.7	0	4.7	0	0.03	
09-7A	2	Rogue Cow	8.9	0	6.2	2.7		
09-8A	2	Rogue Cow	1.5	0	1.5	0		
09-9	09-9	Burnt Rattler	7	0	7	0		
10-1	10-1	Burnt Rattler	26	8	18	0		0.19
10-1WP	10-1	Wolf Pup	49	6	43	0		
11-1	11-1	Wolf Pup	4	0	4	0		
11-1WP	11-1	Wolf Pup	36	4	32	0		
11-2	11-2	Burnt Rattler	14	0	14	0		
11-2A	8	Rogue Cow	0.7	0	0.7	0		
11-3A	8	Rogue Cow	4.6	0	4.6	0		
11-3B	8	Rogue Cow	11.2	0	11.2	0		
12-1	9	Rogue Cow	3.4	0	3.4	0		
12-3A	9	Rogue Cow	2.7	0	0	2.7		
12-3B	9	Rogue Cow	1.5	0	0	1.5		
12-4	9	Rogue Cow	2.9	0	0	2.9		
12-4B	9	Rogue Cow	1.4	0	0	1.4		

Selected Action Unit Information								
Unit reference				Access System			Road Construction	
QA Unit	Timber Sale Prospectus Unit	Timber Sale	Unit Acres	Ground Based	Cable/Skyline	Helicopter	Temporary Route Construction (miles)	Temporary Route Reconstruction (miles)
13-1	10	Rogue Cow	25.7	10.9	8.3	6.5		
13-2	13-2	Burnt Rattler	32	1	31	0		
13-2WP	13-2	Wolf Pup	8	0	8	0		
13-4	13-4	Burnt Rattler	1	0	1	0		
13-4A	13-4A	Burnt Rattler	7	0	7	0		
13-6	13-6	Burnt Rattler	5	0	5	0		
13-A2	10	Rogue Cow	3	0	0	3		
13-A3	10	Rogue Cow	2.1	0	0	2.1		
13-B	10	Rogue Cow	18.7	0	0	18.7		
13-E	10	Rogue Cow	3.5	0	0.7	2.8		
13-□	10	Rogue Cow	2.8	0	2.8	0		
14-1A	11	Rogue Cow	8.5	0	8.5	0	0.15	
14-2	14-2	Burnt Rattler	2	0	2	0		
14-2A	11	Rogue Cow	9.2	0	9.2	0		
14-3A	11	Rogue Cow	5.7	0	5.7	0		
15-1	12	Rogue Cow	2.7	0	2.7	0		
15-1A	15-1A	Burnt Rattler	120	14	100	6	0.77	
15-1B	15-1B	Burnt Rattler	19	0	15	4		
15-2A	15-2A	Burnt Rattler	4	4	0	0		
15-2WP	15-2	Wolf Pup	26	8	18	0		
15-3	12	Rogue Cow	0.5	0	0.5	0		
15-3A	4	Rockstar	23	0	0	23		
15-3B	12	Rogue Cow	0.9	0	0	0.9		
15-4	12	Rogue Cow	5.5	0	0	5.5		
15-4A	15-4A	Burnt Rattler	3	0	0	3		
15-4B	15-4B	Burnt Rattler	1	0	0	1		
15-4C	15-4C	Burnt Rattler	1	0	0	1		
17-1	5	Rockstar	46	1	45	0	0.15	
17-1A	3	Rogue Cow	3.2	3.2	0	0		
17-2	6	Rockstar	59	3	35	21	0.69	
19-2	4	Rogue Cow	6.8	6.8	0	0		
21-1	10	Rockstar	7	5	2	0		

Selected Action Unit information								
Unit reference				In-System			Road Construction	
A Unit	Timber Sale Prospectus Unit	Timber Sale	Unit Acres	Ground Based	Cable/Skyline	Helicopter	Temporary Route Construction (miles)	Temporary Route Reconstruction (miles)
21-3	8	Rockstar	12	0	12	0	0.25	
21-4	7	Rockstar	35	0	32	3		
21-6	9	Rockstar	5	5	0	0		
21-6A	9	Rockstar	7	0	7	0		
23-1	13	Rogue Cow	0.9	0.9	0	0		
23-10C	23-10C	Burnt Rattler	3	0	0	3		
23-1A	23-1A	Burnt Rattler	6	2	4	0		
23-2A	23-2A	Burnt Rattler	5	0	5	0		
23-2B	23-2B	Burnt Rattler	13	0	13	0		
23-2C	23-2C	Burnt Rattler	5	0	5	0		
23-3	13	Rogue Cow	1.6	0	0	1.6		
23-3A	23-3A	Burnt Rattler	20	0	0	20		
23-3B	23-3B	Burnt Rattler	1	0	1	0		
23-4	13	Rogue Cow	2	0	0	2		
23-4A	23-4A	Burnt Rattler	43	20	23	0		
23-4B	23-4B	Burnt Rattler	6	0	0	6		
23-6A	23-6A	Burnt Rattler	1	0	0	1		
23-6B	23-6B	Burnt Rattler	4	0	0	4		
23-7	23-7	Burnt Rattler	11	3	8	0		
23-A	5	Rogue Cow	7.3	0	0	7.3	0.27	
23-B	5	Rogue Cow	2	0	0	2		
23-C	5	Rogue Cow	9.5	0	0	9.5		
23-D	5	Rogue Cow	2.8	0	0	2.8		
23-E	5	Rogue Cow	1.2	0	0	1.2		
23-F	5	Rogue Cow	2.3	0	0	2.3		
25-1A	25-1A	Burnt Rattler	2	2	0	0		
25-2	14	Rogue Cow	1.1	0	1.1	0		
25-2A	25-2A	Burnt Rattler	3	0	3	0		
25-5	14	Rogue Cow	0.8	0	0.8	0		
25-6	14	Rogue Cow	11.5	1.3	10.2	0		
25-7	14	Rogue Cow	2.3	0	2.3	0		

Selected Action Unit Information								
Unit reference				Access System			Road Construction	
TA Unit	Timber Sale Prospectus Unit	Timber Sale	Unit Acres	Ground Based	Cable/Skyline	Helicopter	Temporary Route Construction (miles)	Temporary Route Reconstruction (miles)
27-2A	6	Rogue Cow	80.7	11.9	66	2.8	0.66	
27-3B	15	Rogue Cow	5.8	0	0	5.8		
27-4	15	Rogue Cow	1.9	0	0	1.9		
27-4A	6	Rogue Cow	2.2	2.2	0	0		
27-5	15	Rogue Cow	17.2	0	17.2	0	0.16	
27-5A	6	Rogue Cow	3.1	3.1	0	0		
27-B	27-B	Burnt Rattler	3	0	3	0		
29-1	13	Rockstar	25	0	0	25		
29-1A	Special Mark	Rockstar	3	0	0	3		
29-2B	11	Rockstar	9	0	0	9		
29-3	12	Rockstar	4	0	0	4		
29-3A	12	Rockstar	2	0	0	2		
35-4	16	Rogue Cow	0.5	0	0.5	0		
35-5	16	Rogue Cow	6.9	0	6.9	0	0.3	
TOTAL			1275.8	152.4	815.8	307.6	3.837	0.27
			Acres	Acres	Acres	Acres	Miles	Miles

Douglas Fire Complex Recovery Project Decision Record # 1- Rabbit Mountain Fire Area



Douglas Fire Complex Recovery Project Decision Record # 1- Dads Creek Fire Area

